

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

CASE NO. 23-80101(s)-CR-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

/

GOVERNMENT'S CONSENT MOTION FOR EXTENSION OF TIME

On June 10, 2024, defendant Donald J. Trump filed a motion for an extension of time to submit his Rule 16 expert disclosures. *See* ECF No. 610. On June 11, 2024, the Court granted the motion and set July 8 as the new deadline for the defense Rule 16 expert disclosures. *See* ECF No. 614. The deadline for the Government's supplemental expert disclosures remained July 9, the following day. The written notice Trump's counsel has provided the Government as referenced in ECF No. 610 is incomplete, and the Government cannot fully supplement its expert notice until Trump files his more fulsome actual Rule 16 disclosures. Accordingly, the Government seeks an additional three weeks until July 30 to file its supplemental expert disclosures. As set forth in the Certificate of Conference, defendant Trump consents to this Motion.

For the foregoing reasons, the Court should grant the Government's Motion.

Respectfully submitted,

JACK SMITH
Special Counsel

By: /s/ Jay I. Bratt
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CERTIFICATE OF CONFERENCE

On June 21 and June 28, 2024, counsel for the Government and counsel for defendant Trump conferred in person and via email concerning the relief the Government is seeking in this Motion. Counsel for defendant Trump advised Government counsel that defendant Trump consents to this Motion.

/s/ Jay I. Bratt
Jay I. Bratt

CERTIFICATE OF SERVICE

I, Jay I. Bratt, certify that on June 28, 2024, I served the foregoing document on all parties via CM/ECF.

/s/ Jay I. Bratt

Jay I. Bratt